

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

IP INNOVATION L.L.C. and
TECHNOLOGY LICENSING
CORPORATION,

Plaintiffs,

VS.

APPLE INC.,

Defendant.

Civil Action No. 2:07-cv-146

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION FOR A THIRTY DAY EXTENSION
FOR APPLE, INC. TO ANSWER OR OTHERWISE PLEAD**

Plaintiffs IP Innovation LLC and Technology Licensing Corporation hereby respectfully request on behalf of defendant Apple, Inc. a 30 day extension to answer or otherwise plead in response to the Plaintiffs' complaint. In support of their motion, the Plaintiffs state as follows:

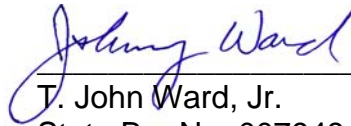
1. The Plaintiffs' Complaint in the present case was filed on April 18, 2007.
2. Apple was served with the Summons and Complaint on April 20, 2007 (Docket entry no. 9, E-GOV SEALED SUMMONS Returned Executed). Thus, Apple's answer is currently due on or before May 10, 2007. *Id.*
3. Since the date the complaint was filed, the Plaintiffs and in house counsel for Apple have been engaged in frequent settlement discussions. The Plaintiffs believe that a short, 30 day extension would benefit the parties by letting them exhaust such settlement discussions and finalize a

settlement agreement instead of filing potentially unnecessary pleadings with the Court.

4. Apple has not yet filed any appearance in the case, but through its in house counsel, has requested an extension during its settlement negotiations with the Plaintiffs.

Therefore, the Plaintiffs respectfully request that this Court grant Apple an additional thirty days, until June 12, 2007, to answer or otherwise plead in response to the Complaint.

Respectfully Submitted,



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